

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**MIAMI DIVISION**

**Case No.: 1:23-cv-20793-PAS**

ANTHONY STANLEY, M.D.

Plaintiff,

v.

THE BRAVEHEART GROUP, LLC, a New Jersey  
Limited Liability Company, d/b/a  
THE JOURNAL OF URGENT CARE MEDICINE, and

EXPERITY INC., an Illinois Corporation, d/b/a  
EXPERITY HEALTH, and

URGENT CARE ASSOCIATION, INC., an Illinois  
Corporation, d/b/a URGENT CARE ASSOCIATION, and

URGENT CARE COLLEGE OF PHYSICIANS, INC.,  
an Illinois Corporation, d/b/a  
COLLEGE OF URGENT CARE MEDICINE.

Defendants.

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**UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO THE  
COMPLAINT**

In accordance with Federal Rule of Civil Procedure 6(b)(1)(A), all defendants move unopposed to extend The Braveheart Group, LLC, Experity, Inc., Urgent Care Association, Inc., and Urgent Care College of Physicians, Inc.'s deadline to move, plead, or otherwise respond to the Complaint by May 4, 2023. Defendants have not previously requested an extension. Defendants contacted Plaintiff about the relief sought in this motion and the Plaintiff does not oppose.

The good cause for the request is that Defendants and their attorneys need additional time to investigate the law and facts that the Complaint puts at issue, to analyze options for responding, and to draft a cogent response.

This extension is not sought for delay or for any other improper purpose, but rather is requested due to a genuine need for more time. As Plaintiff does not oppose the motion, and no other deadlines will be impacted, no party would be prejudiced by the granting of it. As required by Local Rule 7.1(2), a proposed order is attached.

Therefore, the Court should grant this motion and allow Defendants until May 4, 2023, to move, plead, or otherwise respond to the Complaint.

Date: March 30, 2023.

Respectfully submitted,

/s/ Chelsea L. Furman

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